

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590**

SR-6J

MEMORANDUM

DATE: September 16, 2013

SUBJECT: Review of the Removal Quality Assurance Project Plan (QAPP) prepared for Kokomo Dump Superfund Site, Indiana by SESCO, Inc.

FROM: Ida Levin,
Remedial Response Section 2

TO: Shelly Lam, On-Scene Coordinator

I have reviewed the QAPP prepared for Kokomo Dump Superfund Site, IN. by SESCO, Inc. The document was received on September 5, 2013 (SF Log-in No.4289).

The submitted document is very generic. The Administrative Settlement Agreement requires the QAPP to be prepared using the UFP-QAPP format (Section VIII). The information for the UFP-QAPP preparation can be found at www.epa.gov/fedfac/documents/qualityassurance.htm. The contractor did not use any EPA required QAPP format.

The following identify QAPP deficiencies:

1. The signature/approval page must include the signatures of SESCO personnel responsible for the project in addition to the EPA personnel.
2. Organizational chart does not identified independence of QA manager from unit generating data.
3. Summary table for each matrix, concentration level and analytical parameter should be included in the QAPP. These tables should include Project Required Action Limits and quantitation limits.
4. Project Schedule should be included in the QAPP in graphical or tabular format. Section 3.5 mentioned that it's one-time event for drum removal and soil sampling. If the groundwater will be sampled (page 3) or confirmatory soil sampling will be required (Section 3.3) it'll not be one time event and SESCO needs to plan for it.
5. Section 5 (Quality Control Objectives for measurement data) is very generic. The QAPP should identify performance/measurement criteria for all information to be collected and acceptance criteria for information obtained from previous studies, including project action limits and laboratory detection limits of each parameter of interest.

6. The submitted QAPP does not include information about documentation and records. The section should identify report format and summarized all data report package information; list all project documents, records and electronic files that will be produced; identify where project information should be kept and for how long; discuss backup plans for records store electronically.
7. Section 6 (Sampling Procedure) should include the following information: details the type and total number of sample types/matrix or test runs/trials expected and needed; discusses what to do if sampling sites become inaccessible; identifies project activity schedules such as each sampling event, times samples should be sent to the laboratory, etc.; specifies what information is critical and what is for informational purposes only; identifies all sampling SOPs by number, date, and regulatory citation, indicating sampling options or modifications to be taken; indicates how each sample/matrix type should be collected; indicates how samples are to be homogenized, composited, split, or filtered, if needed.
8. Examples of the Chain of Custody form are missing from the QAPP.
9. The examples of the sample identification numbers should be provided.
10. The analytical SOPs used for this project should be included in the QAPP. The attached Pace's Laboratory Quality Assurance Manual does not include any SOPs; it provides only laboratories policies and general procedures.
11. Section 10, Quality Control Checks should provide more details about what should be done when control limits are exceeded, and how effectiveness of control actions will be determined and documented.
12. Individual(s) responsible for data management for lab and field data should be identified.
13. The process for data archival and retrieval should be described.
14. Performance and system audit section should include following information: the number, frequency and type of audit; the individuals responsible for conducting audits should be identified; to whom the audit information should be reported; how the corrective action should be addressed and by whom.